

JUDGE PATTERSON

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

:

INDICTMENT

-v.-

:

08 Cr.

QI PAN,

08 CRIM 132

Defendant.

:

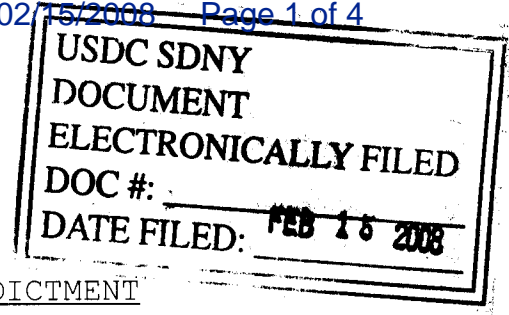
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COUNT ONE

The Grand Jury charges:

1. From at least on or about February 21, 2007, up to and including on or about November 7, 2007, in the Southern District of New York and elsewhere, QI PAN, the defendant, unlawfully, knowingly, and intentionally did traffic and attempt to traffic in goods and services and did use a counterfeit mark on and in connection with such goods and services, and did traffic and attempt to traffic in labels, patches, stickers, wrappers, badges, emblems, medallions, charms, boxes, containers, cans, cases, handbags, documentation, and packaging of any type and nature, knowing that counterfeit marks were applied thereto, the use of which are likely to cause confusion, to cause mistake, and to deceive, to wit, PAN sold counterfeit goods, including, but not limited to, handbags, wallets, jewelry, and sunglasses.

(Title 18, United States Code, Sections 2320(a) and (2).)



FORFEITURE ALLEGATION

AS TO COUNT ONE

2. As a result of committing the offense alleged in Count One of this Indictment, QI PAN, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the trafficking in counterfeit goods.

Substitute Asset Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture

of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 2320(b).)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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QI PAN,

Defendant.

INDICTMENT

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(18 U.S.C. §§ 2320, (2), and 982.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Rita Lora
Foreperson.

2/15/08
6:2
Case assigned to J. Sullivan

M. J. Sullivan